

Miller Media Group

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Randal J. Miller, President



April 27, 2017

To: The Federal Communications Commission
Re: FCC proceeding RM-11786 on FM translators

Dear Commissioners:

These comments are being submitted by Randal J. Miller, president of Kaskaskia Broadcasting, Inc., licensee of WTIM (AM) 870 Assumption, IL, a daytime AM radio station; and WHOW (AM) 1520 Clinton, IL, also a daytime AM radio station with limited pre-sunrise and post-sunset authority. Both AM's have FM translators paired with the AM in each community.

I'm also president of Miller Communications, Inc., licensee of WMKR (FM) 94.3 Pana, Illinois, which also has 3 HD Radio channels that have simulcasts on FM translators serving the local market.

We are in strong support of this proposed rulemaking. FM translators carrying AM stations and the diverse programming of HD subchannels are now vital to many communities and listeners, especially in small markets such as ours.

We believe that local radio service provided by an FM translator—whether it's simulcasting programming from an AM licensed station or HD Radio station--should not be removed from the air by the FCC unless there is a significant public interest reason to do so, and the public would be significantly served by such a loss of service.

Our FM translators provide our local communities with these additional programming choices:

2 of them simulcast programming on our daytime AM stations, providing nighttime broadcasts of high school sports broadcasts, local news, and weather alerts
One of them provides a niche' music format of Top 40 Country not heard on the co-

owned full-power stations

One of them provides a niche' music format of Easy Hits, again not heard on the co-owned full-power stations

All of these translators provide local news, local weather, and severe weather alerts as sent by the National Weather Service.

Local radio service provided by an FM translator should not be removed from the air by the FCC unless there is a significant public interest reason to do so, and the public would be significantly served by such a loss of service.

We would encourage the Commission to narrow the scope of current FM translator interference rules, so that a far-away full-power station cannot take an FM translator station off the air unless there are multiple complaints over a short period of time, about the alleged interference.

Further, if there are no interference complaints after a set length of time, such as 60 or 120 days, then the FM translator would not be forced off the air if an interference complaint was filed.

We hope the Commission will come up with some "common-sense" rules regarding FM translator interference complaints, and we are in support of the rulemaking.

Thanks for your consideration.